Samidh Guha
Estela Díaz
Jennelle D. Menendez
AKIN GUMP STRAUSS HAUER & FELD LLP
One Bryant Park
New York, NY 10036
(212) 872-1000
(212) 872-1002
sguha@akingump.com
ediaz@akingump.com
jmenendez@akingump.com

Attorneys for Starbucks Corporation and Jennifer Gurtov

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SERENITY MARSHALL,

Plaintiff,

v.

STARBUCKS CORPORATION and JENNIFER GURTOV, in her individual and official capacities,

Defendants.

Civ. Action No. 11-CV-2521(AJN)(KNF)

## **DECLARATION OF SAMIDH GUHA**

- I, SAMIDH GUHA, an attorney duly admitted to practice law in the State of New York, and in the Southern District of New York, hereby affirm under penalty of perjury as follows:
- 1. I am an attorney at Akin Gump Strauss Hauer & Feld, LLP. My firm represents the defendants in the above-referenced action.
- 2. Attached to this declaration as "Exhibit A" is a true and correct copy of the "Starbucks Company Profile" report, printed May 8, 2012, and available on the official

Starbucks website at http://assets.starbucks.com/assets/aboutuscompanyprofileq42011121411 final.pdf.

- 3. Attached to this declaration as "Exhibit B" is a true and correct copy of the transcript of the deposition of plaintiff Serenity Marshall, and the Exhibits thereto, dated December 8, 2011.
- 4. Attached to this declaration as "Exhibit C" is a true and correct copy of the Starbucks "New Hire Kit" information page, produced as part of defendants' document production and marked as STAR\_MARSHALL0000513.
- 5. Attached to this declaration as "Exhibit D" is a true and correct copy of the Starbucks "Partner Guide," produced as part of defendants' document production and marked as STAR MARSHALL0000514-0000569.
- 6. Attached to this declaration as "Exhibit E" is a true and correct copy of the Starbucks "Partner Resources Manual."
- 7. Attached to this declaration as "Exhibit F" is a true and correct copy of the transcript of the deposition of Tina Pizarro, and the Exhibits thereto, dated January 11, 2012.
- 8. Attached to this declaration as "Exhibit G" is a true and correct copy of the transcript of the deposition of defendant Jennifer Gurtov, and the Exhibits thereto, dated December 21, 2011.
- 9. Attached to this declaration as "Exhibit H" is a true and correct copy of the transcript of the deposition of defendant Terrie Rucker, and the Exhibits thereto, dated January 9, 2012.

- 10. Attached to this declaration as "Exhibit I" is a true and correct copy of an email produced as part of defendants' document production, the "Welcome Back Email", marked as STAR\_MARSHALL0002119.
- 11. Attached to this declaration as "Exhibit J" is a true and correct copy of an email produced as part of defendants' document production, the "Cash Handling Email II", marked as STAR\_MARSHALL0000182.
- 12. Attached to this declaration as "Exhibit K" is a true and correct copy of the PRSC Case Notes regarding Leedel Griffin, produced as part of defendants' document production and marked as STAR\_MARSHALL0009590-0009593.
- 13. Attached to this declaration as "Exhibit L" is a true and correct copy of an email produced as part of defendants' document production, the "Adler Email", and marked as STAR\_MARSHALL0002163.
- 14. Attached to this declaration as "Exhibit M" is a true and correct copy of the Starbucks "U.S. Benefits Plan Description," produced as part of defendants' document production and marked as STAR MARSHALL0000233-0000512.
- 15. Attached to this declaration as "Exhibit N" is a true and correct copy of the transcript of the deposition of Nancy Murgalo, and the Exhibits thereto, dated December 23, 2011.
- 16. Attached to this declaration as "Exhibit O" is a true and correct copy of an email produced as part of defendants' document production, the "Recap Email", and marked as STAR MARSHALL0002365.

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Attached to this declaration as "Exhibit P" is a true and correct copy of the PRSC 17.

Case Notes regarding Serenity Marshall, produced as part of defendants' document production

and marked as STAR\_MARSHALL0009703-0009706.

18. Attached to this declaration as "Exhibit Q" is a true and correct copy of an email

produced as part of defendants' document production, the "Summary Email", marked as

STAR MARSHALL0001614-0001622.

19. Attached to this declaration as "Exhibit R" is a true and correct copy of the

Business and Ethics Hotline case summary, produced as part of defendants' document

production and marked as STAR MARSHALL0000001-0000004.

20. Attached to this declaration as "Exhibit S" is a true and correct copy of an email

produced as part of defendants' document production, the "Murgalo Email", marked as

STAR MARSHALL0001662.

21. Attached to this declaration as "Exhibit T" is a true and correct copy of the

Starbucks District Manager Job Description, produced as part of defendants' document

production and marked as STAR MARSHALL0009594-0009596.

22. I declare under the penalties of perjury that the foregoing is true and accurate to

the best of my knowledge and belief.

Dated: New York, New York

May 8, 2012

/s/ Samidh Guha

Samidh Guha

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